HAZARDOUS MATERIALS

Introduction

From July 15 through August 15, 1997, FRA conducted a Hazardous Materials (HM) Safety Review of CSXT. Also, from August 4 through August 13, 1997, focused inspections were conducted at preselected locations, *i.e.* Chicago, Illinois; Cincinnati, Ohio; Willard, Ohio; St. Louis, Missouri; Nashville, Tennessee; and New Orleans, Louisiana. These locations were selected in order to provide FRA the widest view of CSXT activities.

FRA inspected 275 trains and found 344 deficiencies of the Federal Regulations. Examples of the most serious deficiencies follow:

- ! A Car Foreman failed to replace oxidizer placards on a tank car after having been informed of the deficiency by FRA. The train departed <u>one day after</u> the deficiency had been brought to the attention of the Car Foreman; however, the placards had not been replaced.
- ! As a train arrived at the yard, FRA observed that one of its tank cars was leaking. The FRA team notified the CSXT Assistant Superintendent, who asked permission to move the car over the hump so he could handle the other cars in the train. FRA informed him that it was permissible to move the car, but also advised him that he should make every effort to protect personnel from possible splashing from the car. The Assistant Superintendent never reported the car for corrective action, and it moved in a leaking condition in Train # 207 to Louisville, Kentucky without repairs having been made.
- ! A movement waybill indicated that a tank car had been moved as overweight with the notation "OK to Go" from a CSXT manager. FRA noted that waiver applications had not been filed to obtain movement approval from the Washington, DC office. The car, which weighed twice at 287,700 pounds, contained molten sulphur.
- ! A tank car which contained Phenol 6.1 was moved without the appropriate repairs having been made. FRA discovered the manway cover open and the gasket missing.

This information was provided to the appropriate CSXT manager, who indicated to FRA that the car subsequently had been repaired. The car then moved en route to Placquemine, Louisiana, where it was met by an FRA Inspector and inspected. The FRA inspector found three of eight manway closure bolts less than tool tight.

! An FRA inspector observed that a loaded tank car, placarded CORROSIVE, had been coupled next to the trailing locomotive. This had been done by the train crew after setting out a block of cars. The FRA Inspector asked the Conductor if a loaded hazardous materials car could be placed next to the engine. The Conductor stated he believed the car to be properly placed. Interviews indicated the crew possibly did not have a thorough understanding of the train placement regulations.

Concerns, Discussion, and Recommendations

Concern: Required Documentation

FRA is concerned that CSXT train crews are not receiving the required hazardous materials documentation on departure from originating terminals.

Discussion:

FRA believes problems are occurring because train crews departing terminals at crew change points are no longer inspecting their trains. Therefore, they must rely on the accuracy of hazardous materials train placement and documentation being provided by the carrier.

Recommendations:

CSXT must improve the accuracy of train consists, especially for trains made up in yards. Possible methods to achieve this include the following:

- ! More thorough inspection of lists by hump and train crews;
- ! Better use of existing technology, such as more strategically placed AEI readers;
- ! Requirements that outbound train crews inspect train makeup against the actual

consist;

- ! Assignment of additional employees to check yard tracks;
- ! More oversight of centralized way billing centers, to assure that they are vigilant in making corrections to waybills and inputting the new data; and
- ! Continual monitoring of the individual blocks of cars by a clerk stationed at the trim tower, which would afford CSXT personnel an opportunity to review each and every block of cars placed in an outbound train, and allow correction of consist errors prior to the train's departure.

FRA believes these practices, or equivalent ones, should be utilized at locations where train consist accuracy is a problem.

Concern: EDI Errors

Intermodal TOFC and COFC shipments are being transported without the required hazardous materials documentation.

Discussion:

FRA believes that problems are occurring when shippers transmit EDI hazardous materials shipments as "Freight of All Kinds," and then FAX the required hazardous materials information to the billing center. The merging of this information is not being done in a timely manner. This results in hazardous materials shipments being moved in trains without the required hazardous materials information.

Recommendations:

- ! CSXT should provide to ramp contractors additional hazardous materials training, so that they can perform their duties properly, in compliance with the hazardous materials regulations.
- ! CSXT should thoroughly check containers, which come through the gates at intermodal facilities, to ensure that documentation and shipments are in agreement.
- ! CSXT managers should assure that centralized way billing centers become more

responsive in making corrections and updating waybills.

Concern: Replacement of Placards

Worn or lost placards are not replaced consistently.

Discussion:

There is no clear procedure to replace lost, worn, or faded placards throughout the CSXT system. The car department does not always replace them, and the clerical department no longer inspects trains for verification. There is no clear-cut operating procedure established at CSXT to uniformly address placards.

Recommendations:

- ! CSXT must establish a uniform procedure for ensuring placards are replaced, and assign qualified personnel to carry it out effectively.
- ! CSXT managers should take steps to heighten yard crews' and car inspectors' awareness of this issue. Managers should enforce the inspection of cars for missing or improperly displayed placards.
- ! CSXT managers need to ensure that missing or damaged placards are replaced in conjunction with FRA inspections.
- ! CSXT should establish system-wide training in the replacement of required placards.

Concern: Hazardous Materials Training

Train crews, car department employees, Train Dispatchers, and Trainmasters do not receive adequate training concerning regulations and procedures related to the movement of hazardous materials.

Discussion:

After reviewing the training conducted for employees, FRA found that the hazardous materials training conducted by CSXT did not prepare employees to adequately monitor compliance with regulations concerning the transport of hazardous materials.

Recommendations:

- ! CSXT should conduct a review of the hazardous materials training curriculum, making necessary revisions.
- ! CSXT should place more emphasis on hazardous materials training.
- ! CSXT's company officers should conduct hazardous materials question and answer sessions during safety meetings to supplement employee training.
- ! CSXT's managers should incorporate hazardous materials items in the Safety Rule of the Day notices.

Concern: <u>Notification of Hazardous Material Locations for Employees</u> Inspecting Trains

Railroad employees (designated under 49 CFR Part 215.11 or Subpart D) are inspecting trains without knowledge of the location of hazardous materials.

Discussion:

Compliance failures occur when cars that are required to be placarded have missing or improperly displayed placards. In such situations, railroad employees would have no knowledge of the presence of hazardous materials. Freight containers also may have hazardous materials in them, but may not be required to be placarded.

Recommendations:

! CSXT managers should take steps to heighten crew and car department

employees' awareness of the location of hazardous materials cars.

- ! CSXT managers should ensure that car department employees receive copies of train consists that have the required hazardous materials documentation before proceeding with their tasks; and
- ! CSXT should provide to car department employees additional hazardous materials training.